

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:18-CR-407-FL

UNITED STATES OF AMERICA

v.

STEPHANIE CHAVIS

NOTICE OF INTENT TO SEEK A
DOWNWARD VARIANCE

The Defendant, STEPHANIE CHAVIS, by and through undersigned counsel respectfully submits this notice of her intent to seek a downward variance based on the factors in 18 U.S.C. § 3553 including: the nature and circumstances of the offense, the history and characteristics of the defendant, the need for the sentence imposed to provide deterrence, to protect the public, to provide just punishment, and the need for education, vocational training, and treatment. Undersigned counsel will provide reasons and argument at sentencing to support, a sentence below the applicable United States Sentencing Guidelines range as such a sentence is “sufficient, but not greater than necessary” to accomplish the statutory factors set forth in 18 U.S.C. § 3553(a).

Accordingly, Ms. Chavis respectfully informs this Court of her intent to seek a downward variance from the advisory range.

Respectfully requested this 1st day of October, 2021.

G. ALAN DuBOIS
Federal Public Defender

/s/ Lauren H. Brennan
LAUREN H. BRENNAN
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LR 57.1 Counsel
Appointed

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon:

ADAM F. HULBIG
Assistant United States Attorney
150 Fayetteville Street, Suite 2100
Raleigh, NC 27601

by electronically filing the foregoing with the Clerk of Court on October 1, 2021, using the CM/ECF system which will send notification of such filing to the above.

This the 1st day of October, 2021.

/s/ Lauren H. Brennan
LAUREN H. BRENNAN
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